

Exhibit 2

Illustrative District Analysis

Supplemental Expert Report of David Ely

Pursuant to 28 U.S.C. sec. 1746, I declare the following:

After reviewing deposition testimony and new data identified by Defendants' experts, including geocoded registration data and block group citizenship data, I have determined that it is possible to create at least one additional alternative illustrative single member district with a Hispanic share of citizen voting age population ("CVAP") that is well over 50%. To perform my analysis for the purposes of this report and, specifically, to create the alternative illustrative district, I used the block group citizenship rates and voter registration data provided by Defendants' experts in testimony and production to estimate Hispanic share of CVAP and the Spanish surname share of registration at the census block level. My conclusions in this supplemental report demonstrate that not only can an illustrative district with a Hispanic CVAP majority be created using the data and assumptions I used in my original report, but, using data identified by Defendants' experts, alternative districts can be drawn, each with a greater Hispanic share of CVAP than that of the illustrative district in my initial report.

I. Spanish Surname Registration Distribution

Defendants' experts supplied a registered voter list with Spanish surname flags and geographic locations. I assigned each registered voter in Irving to a census block based on the geographic locations supplied by Defendants' experts and created a count of total registration and Spanish surname registration by census block.¹ I then examined the census block level distribution of Spanish surname registered voters and created a district that includes additional areas with high concentrations of Spanish surname registered voters. Using the block group citizenship rates, as recommended by Dr. Rives, and projecting forward to 2008, as described in my initial report, I estimate that the Hispanic share of CVAP in 2008 for this district is 50.5%. Figure 1 is a map of this district and the distribution of Spanish surname registered voters. Table 1 shows the characteristics of this district.

Table 1

2000 Population	23940	
2000 Hispanic Population	16126	67.4%
2000 Hispanic VAP	10069	63.8%
2000 Hispanic CVAP (BG)	3173	37.6%
2008 Hispanic CVAP (BG)	4503	50.5%
2008 Span. Surname Regist. Voters	1924	40.9%

¹ This count of Spanish surname registered voters is based on records flagged by Dr. Rives as having Spanish surnames.

II. Block Group Citizenship Rates

Although the differences between tract level and block group level citizenship rates are quite small and largely statistically insignificant,² Dr. Rives has argued that using tract level rates introduces a bias since the block group rates consistently produce a lower estimate for Hispanic share of CVAP. To address this concern, I have examined the distribution of Hispanic CVAP in Irving based on block group citizenship rates, and constructed a district reflecting this distribution. Using the block group citizenship rates, as recommended by Dr. Rives, and projecting forward to 2008, as described in my initial report, I estimate that the Hispanic share of CVAP in 2008 for this district is 53.1%. Figure 2 is a map of this district with the distribution of Hispanic CVAP concentrations. Table 2 shows the characteristics of this district.

Table 2

2000 Population	23941	
2000 Hispanic Population	16667	69.6%
2000 Hispanic VAP	10531	66.4%
2000 Hispanic CVAP (BG)	3306	40.0%
2008 Hispanic CVAP (BG)	4692	53.1%
2008 Span. Surname Regist. Voters	1853	38.2%

² Dr. Rives states in his deposition at page 107, lines 17 – 20: "And the difference of 2% [between the tract and block group based estimates of Hispanic share of CVAP for the illustrative district in Dave Ely's initial report] is almost certainly within the margin of error, if you were to ask whether that difference is statistically significant."

III. New Illustrative District

After examining the distributions of Spanish surname registered voters and Hispanic CVAP in Irving, I have constructed a new illustrative district ("Illustrative District A").³ Using the block group citizenship rates, as recommended by Dr. Rives, and projecting forward to 2008, as described in my initial report, I estimate that the Hispanic share of CVAP in 2008 for Illustrative District A is 58.0%. Figure 3 is a map of this district. Table 3 shows the characteristics of this district.

Table 3

2000 Population	23882	
2000 Hispanic Population	17627	73.8%
2000 Hispanic VAP	11151	70.9%
2000 Hispanic CVAP (BG)	3439	44.9%
2008 Hispanic CVAP (BG)	4881	58.0%
2008 Span. Surname Regist. Voters	1781	40.7%

IV. Conclusions

The districts described in this report demonstrate that there are multiple potential configurations of a single member district in the City of Irving in which Hispanics would comprise an overwhelming majority of the population according to the 2000 Census. My analysis indicates that Hispanics also comprise a majority of CVAP in these districts in 2008.⁴ In particular, Illustrative District A is estimated to have a strong majority (58%) of Hispanic CVAP. An estimate this far in excess of 50% -- one that is obtained using the lower block group level

³ An alternative to Illustrative District A ("Illustrative District B") is attached at Appendix 1. Illustrative District B, with a somewhat different configuration than Illustrative District A, has a 56.5% Hispanic share of CVAP, which, as with Illustrative District A, is well over 50%.

⁴ A table showing CVAP estimates for 2000, 2006, and 2008 for each of the districts described in this Supplemental Report is attached at Appendix 2.

citizenship rates recommended by Dr. Rives -- indicates a very high probability that Illustrative District A does indeed presently have a Hispanic CVAP majority.

Executed on November 24, 2008,

A handwritten signature in black ink, appearing to read "David Ely", is written over the printed name.

David Ely

Figure 1
Map of Spanish Surname Registered Voter Distribution

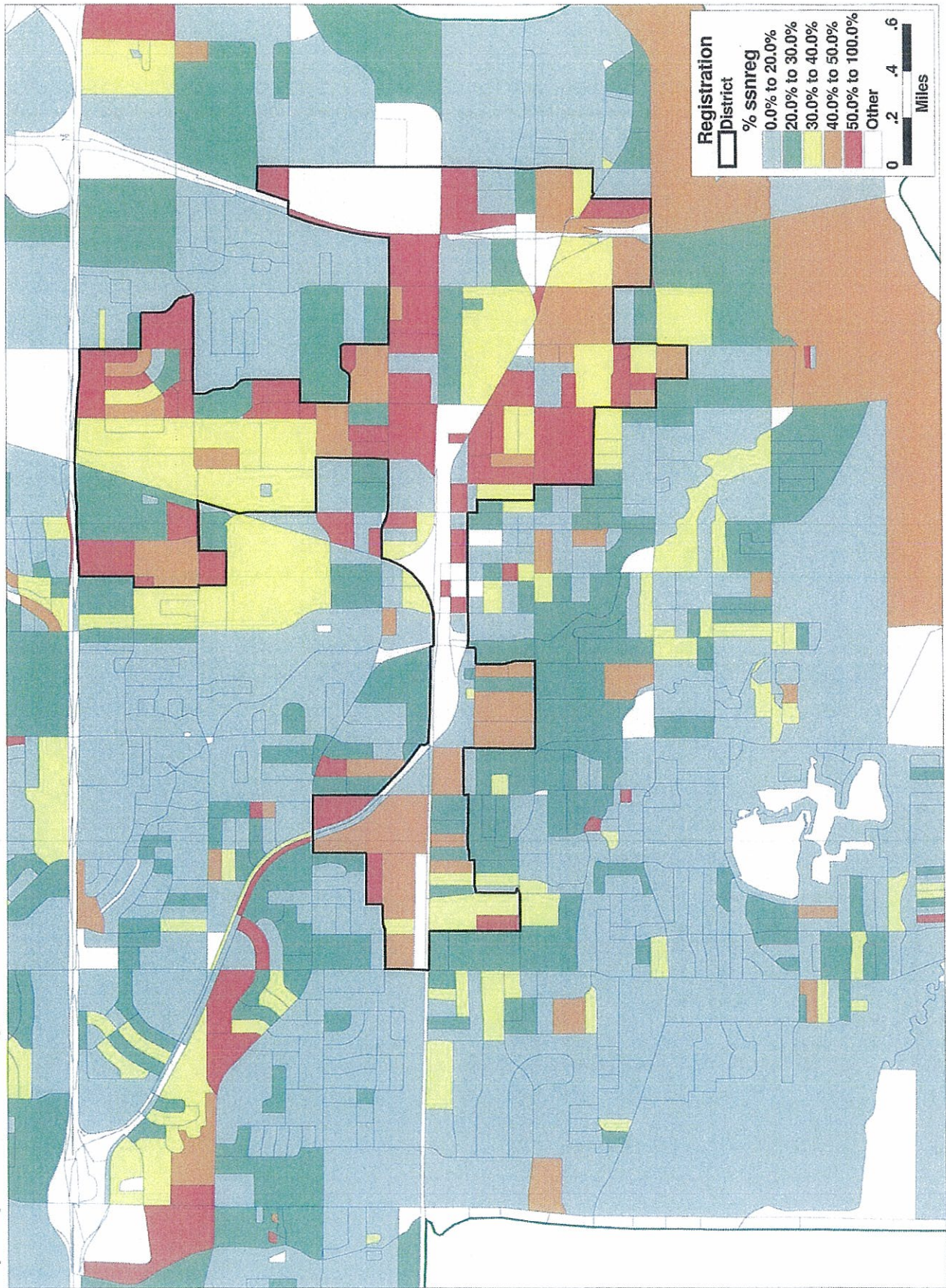


Figure 2
Map of Hispanic Citizen Voting Age Population based on Block Group Citizenship Rates

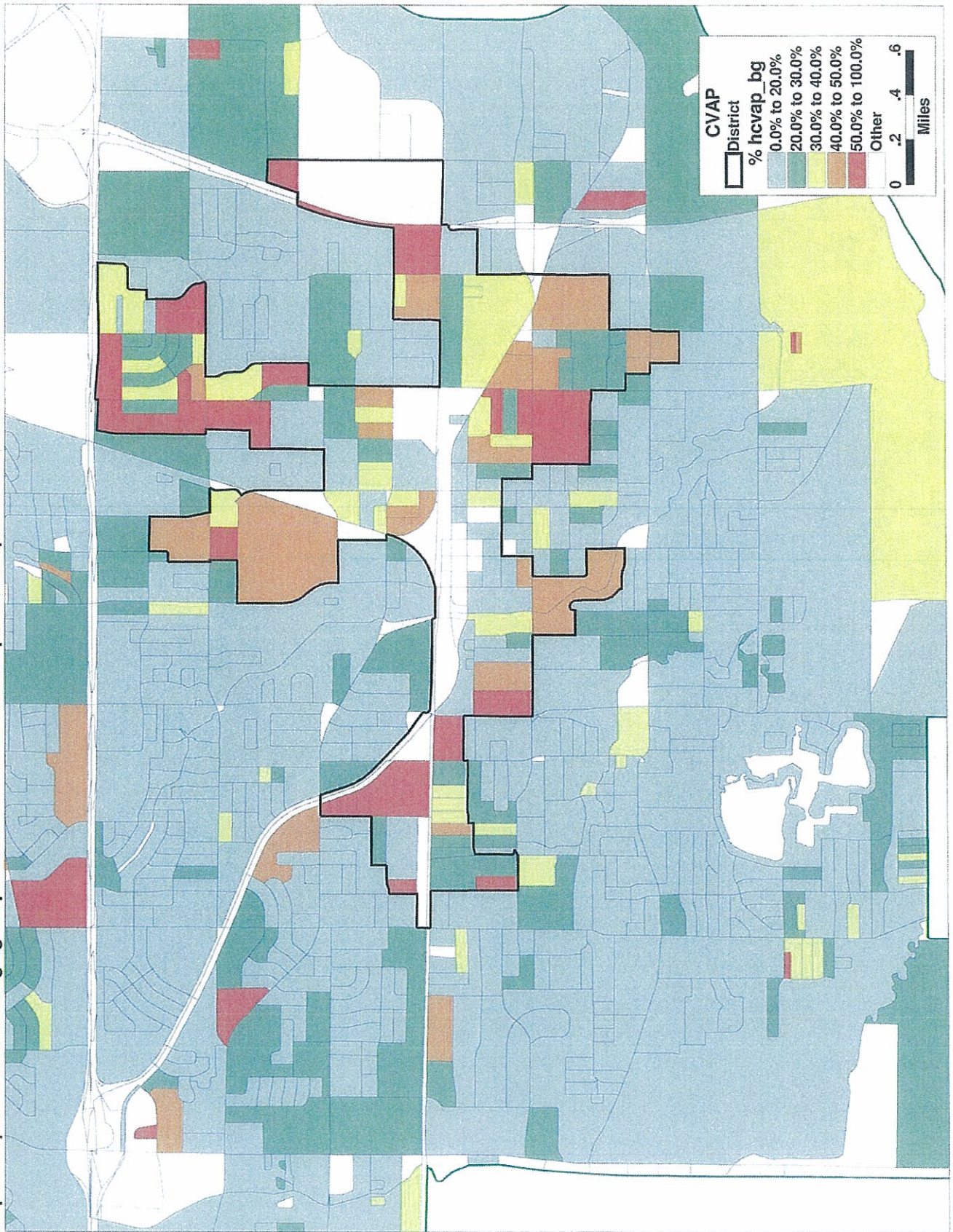
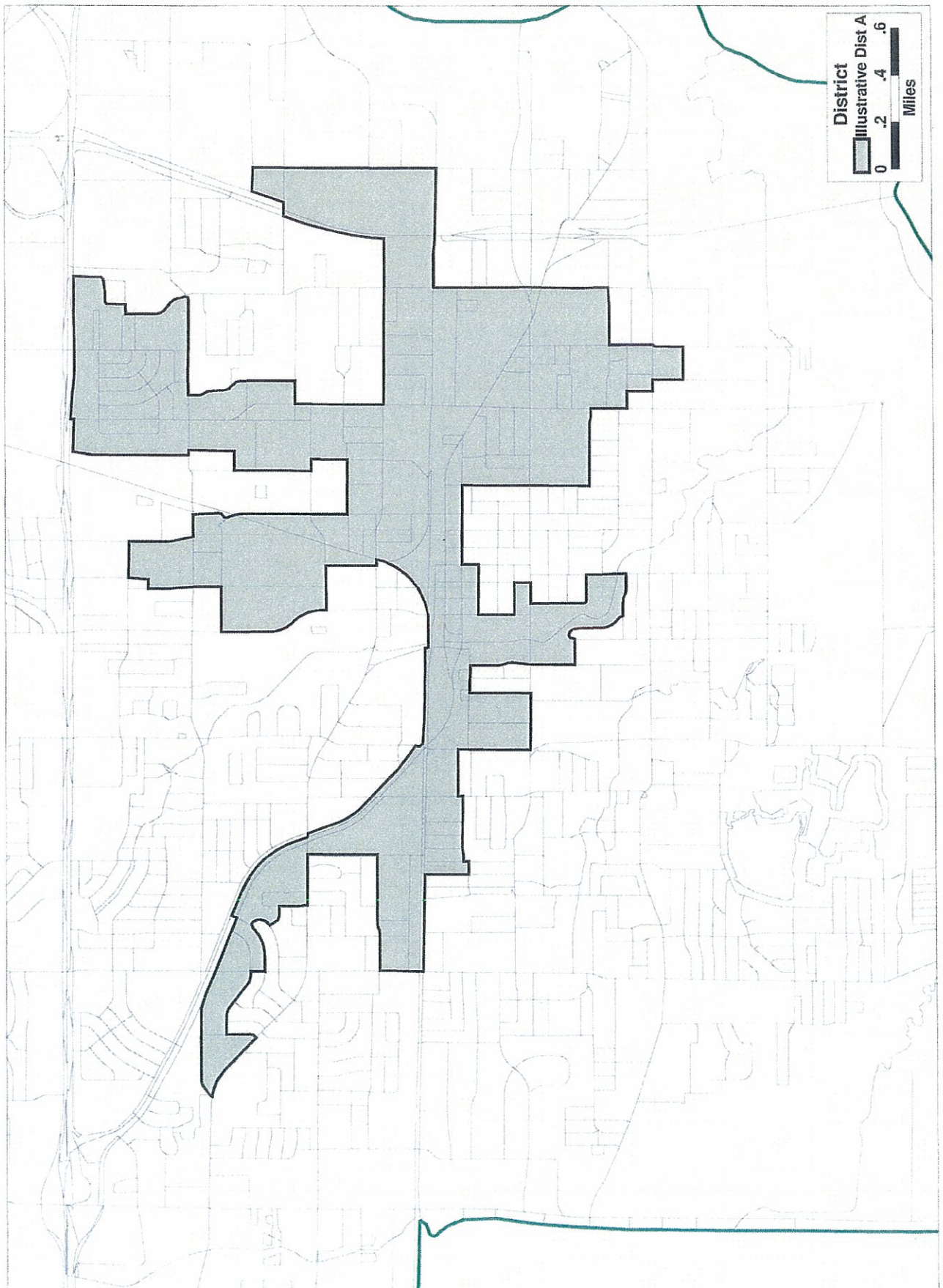
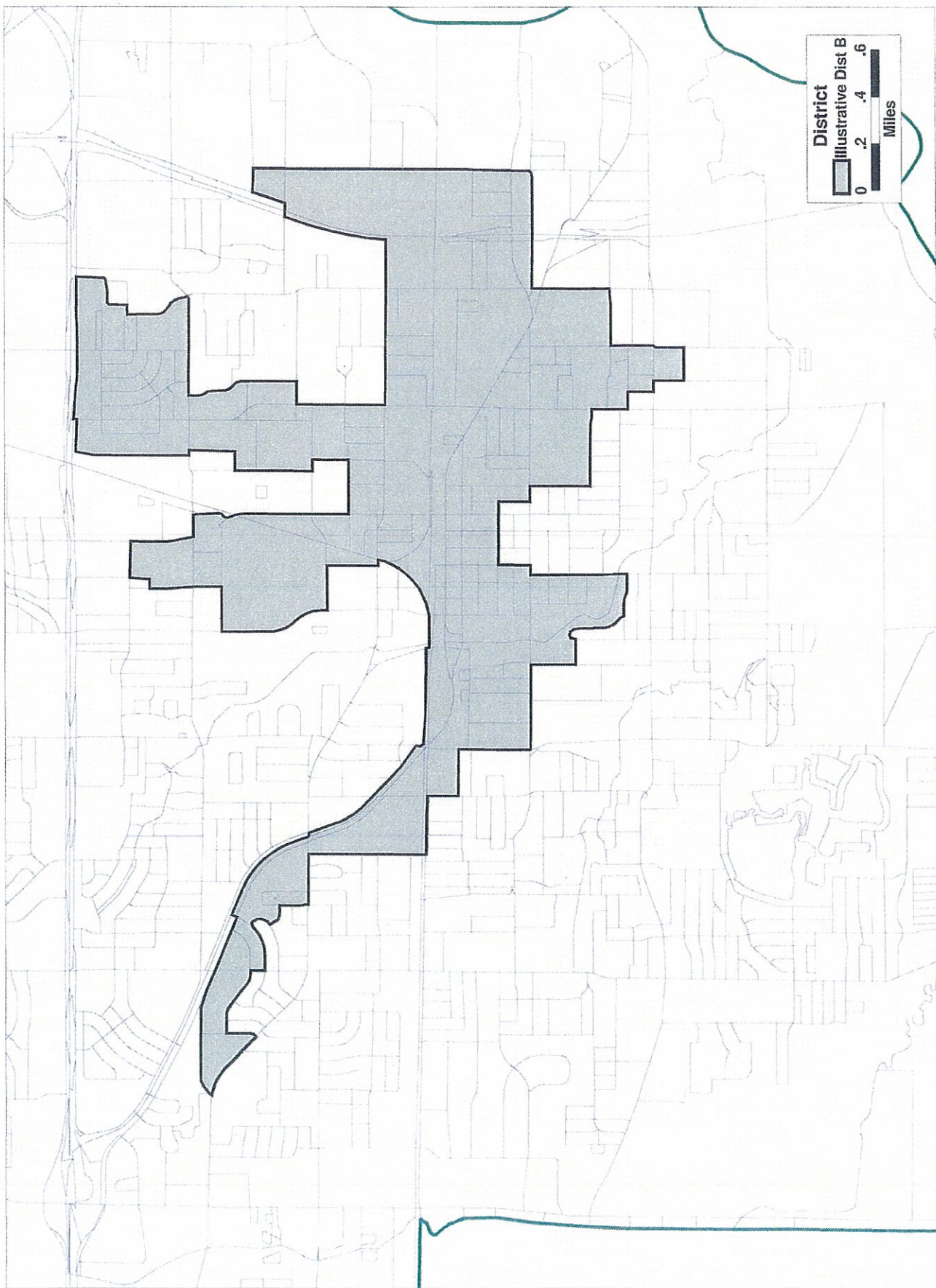


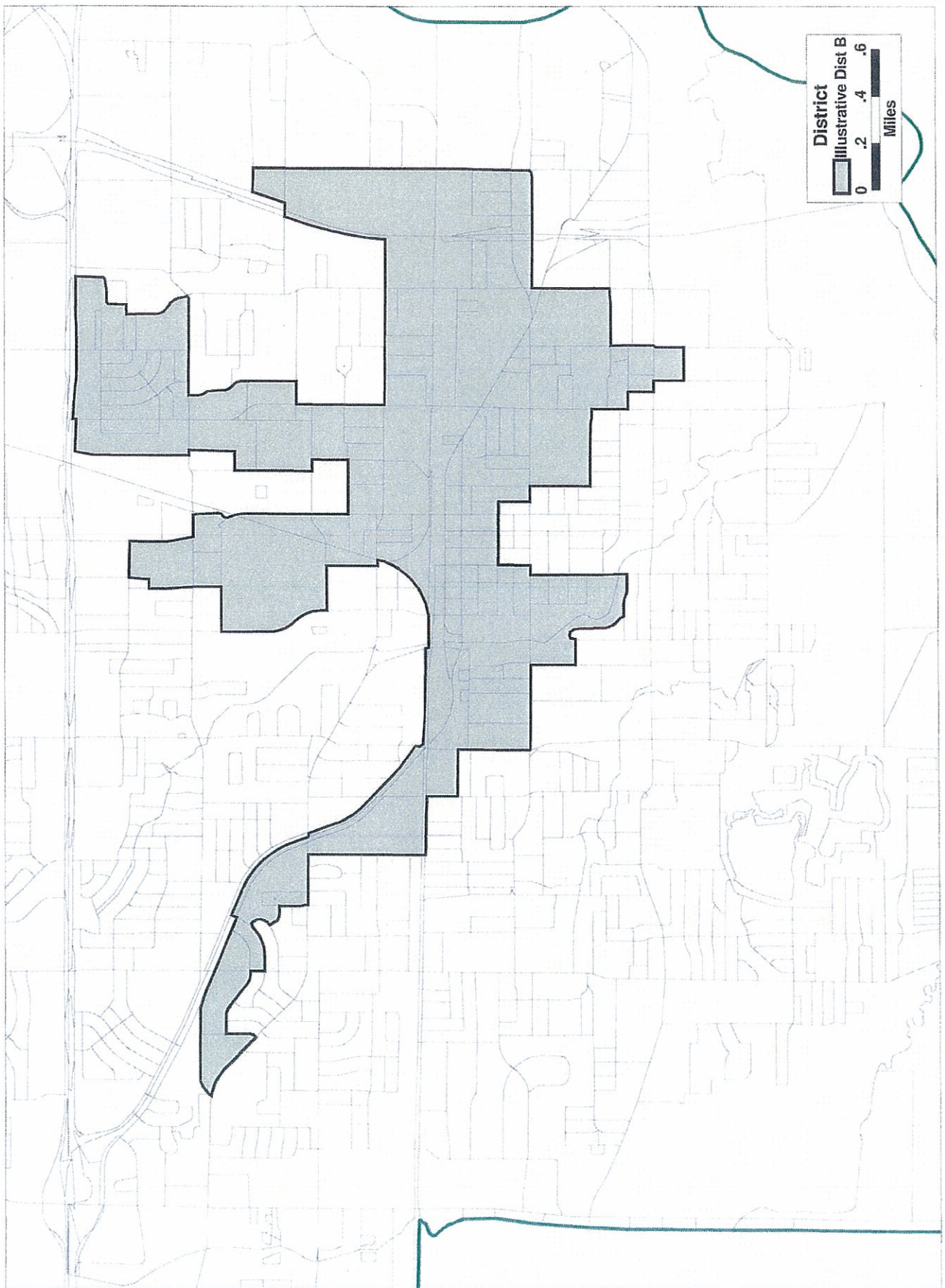
Figure 3
Illustrative District A



Appendix 1
Illustrative District B



Appendix 1
Illustrative District B



Appendix 2:

Hispanic Share of CVAP Estimates

	2000		2006		2008	
Registration based District						
Hispanic	3172.9	37.6%	4126.0	47.2%	4503.5	50.5%
Non-Hispanic	5275.9		4619.8		4419.8	
Total	8448.7		8745.8		8923.3	
CVAP Based District						
Hispanic	3305.9	40.0%	4298.9	49.8%	4692.3	53.1%
Non-Hispanic	4948.6		4333.2		4145.6	
Total	8254.5		8632.1		8837.9	
Illustrative District A						
Hispanic	3438.8	44.9%	4471.7	54.8%	4880.8	58.0%
Non-Hispanic	4218.6		3694.0		3534.0	
Total	7657.3		8165.7		8414.9	
Illustrative District B						
Hispanic	3379.0	43.4%	4394.0	53.2%	4796.0	56.5%
Non-Hispanic	4411.0		3862.5		3695.3	
Total	7790.0		8256.5		8491.3	